

Received & Inspected

AUG 24 2010

FCC Mail Room

8/17/10

ATTN: Carmell Weathers  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> St. SW  
Room TW-A325  
Washington, DC 20554

RE: Section 63.71 Application of Pelzer Communications

Dear Ms. Weathers,

Please accept the following comments related to the Section 63.71 application of Pelzer Communications ("Pelzer"). ASRC Federal Holding Company ("AFHC") hereby requests that the Federal Communications Commission ("FCC") extend the date of discontinuance from September 17, 2010 to October 31, 2010, in order to give AFHC adequate time to secure replacement services. AFHC is a wholly owned subsidiary of Arctic Slope Regional Corporation. AFHC owns eight subsidiary companies and is a shared services provider for these companies, including ASRC Management Services and ASRC Communications.

AFHC was first notified of Pelzer's intent to discontinue service via electronic mail on August 11, 2010. Pelzer filed a Section 63.71 Application to Discontinue Telecommunications Service with the FCC on August 12, 2010. AFHC received an electronic copy of the Section 63.71 Application on August 16, 2010.

Pelzer currently provides AFHC and its subsidiaries with the following services:

- 5 PRIs impacting all DIDs and Toll-free numbers for AFHC's headquarters in Greenbelt, MD, as well as offices in Albuquerque, NM and Reston, VA.
- 2 Primary Data Circuits for AFHC's headquarters in Greenbelt, MD, as well as the Troy, MI office.

Any service discontinuance would impact AFHC's ability to conduct business and provide services to our customers, which are all United States Government Federal Agencies. AFHC, through its subsidiaries, provides engineering, technical, management, and other services to numerous departments and would be severely hampered in our ability to continue to support these agencies. AFHC would be unable to communicate with customers, satellite offices, remote work sites, and others necessary to run AFHC's operations.



6303 Ivy Lane, Suite 120 Greenbelt, MD 20770  
tel 301-837-5500 fax 301-837-5535 www.asrcfederal.com

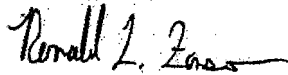
AFHC has already taken the following steps to securing substitute service:

- contacted a third party agent to solicit quotes for all replacement services needed;
- selected vendors to replace the soon to be discontinued services;
- created internal purchase orders; and
- entered negotiations to finalize contract language for the replacement services.

I have attached copies of the purchase orders AFHC has placed for replacement services. Once AFHC receives contract approval from the carriers, AFHC will schedule the CSR site survey and proceed with all steps necessary for installation of the replacement services. AFHC cannot locate any carriers that are able to provide replacement services by the September 17, 2010 deadline.

AFHC respectfully requests that the FCC extend the date of discontinuance to October 31, 2010, in order to give AFHC adequate time to secure replacements for the services Pelzer is currently providing.

Sincerely,



Ronald L. Fouse  
VP and General Counsel  
ASRC Federal

CC: Competition Policy Division, Wireline Competition Bureau



Office of Spectrum Management Services  
12021 Sunset Hills Road  
Suite 330  
Reston, VA 20190

PAE001

Ship To: ASRC Management Services  
Office of Spectrum Management Services  
12021 Sunset Hills Road  
Suite 330  
Reston, VA 20190

Page: 1 of 1  
Date Printed: 08/16/2010

ORDER DATE	BUYER	TERMS	FOB	SALES ORDER	SHIP VIA	DELIVER TO		
09/03/10	GRIFFIN, RONALD	NET 30				Ralph Cager		
LINE	ITEM/DESCRIPTION	REV	U/M	DUE DATE	DESIRED DATE	QUANTITY	NET UNIT COST	EXTENDED COST
	Period of Performance: 09/03/10 To 09/01/11  PAETEC Quote #: 387989 / POP: 09/21/2011  ***** All invoices must match the sequence, description and quantity identified in this PO. Nonconforming invoices will be returned for correction which will result in payment delays. *****							
1	SVC PRI/DID/LD SERVICE PAETEC Quote #: 387989  Vdr Part: PRI/DID/LD  AOP: 7045-005 1.008.30.4.102  Bill To: ASRC Management Services Attn: Accounts Payable P. O. Box 400 Greenbelt, MD 20768-0400  Ronald Griffin  Authorized Signature(s)		MO	09/03/10	09/03/10			
							PO Total Amt:	

**ASRC Management Services**

Office of Spectrum Management Services  
12021 Sunset Hills Road  
Suite 330  
Reston, VA 20190

**Purchase Order: AMS1533**

Page: 2 of 1  
Date Printed: 08/16/2010

Order To: PAETEC  
6801 MORRISON BLVD  
CHARLOTTE, NC 28211

PAE001

ORDER DATE	BUYER	TERMS	FOB	SALES ORDER	SHIP VIA	DELIVER TO		
09/03/10	GRIFFIN, RONALD	NET 30				Ralph Cager		
LINE	ITEM/DESCRIPTION	REV	U/M	DUE DATE	DESIRED DATE	QUANTITY	NET UNIT COST	EXTENDED COST

ASRC Communications LTD  
6303 Ivy Lane  
Suite 130  
GREENBELT, MD 20770

Purchase Order: COM816

Page: 1 of 1  
Date Printed: 08/16/2010

Order To: PAETEC  
6801 MORRISON BLVD  
CHARLOTTE, NC 28211

PAE001

Ship To: ASRC Communications LTD  
8500 Menaul Blvd NE  
Suite B470  
Albuquerque, NM 87112

ORDER DATE	BUYER	TERMS	FOB	SALES ORDER	SHIP VIA	DELIVER TO		
08/16/10	GRIFFIN, RONALD	NET 30				RCager c/o Jeff Baron		
LINE	ITEM/DESCRIPTION	REV	U/M	DUE DATE	DESIRED DATE	QUANTITY	NET UNIT COST	EXTENDED COST
	Extend Dmark billing POC: Jeff Baron 301-831-9007 Technical POC: Al Iannaconne 301-837-3814 POP: 9/3/2010 - 9/1/2011  ***** All invoices must match the sequence, description and quantity identified in this PO. Nonconforming invoices will be returned for correction which will result in payment delays. *****							
1	SVC PRI/DIDs & LD service PAETEC Quote # 387981   AOP: 8045-005 1.003.05.1.020  Bill To: ASRC Communications LTD Attention: Accounts Payable PO Box 400 Greenbelt, MD 20768-0400  Ronald Griffin  Authorized Signature(s)			MON 09/03/10	09/03/10			
				Req: 11877				
				003I0020.001.001				
							PO Total Amt:	

Digitally signed by Ronald Griffin  
DN: cn=Ronald Griffin, c=US, o=ASRC  
Federal Holding, ou=Procurement,  
email=Ronald.Griffin@asrcfederal.com  
Date: 2010.08.16 16:29:21 -0400

ASRC Communications LTD  
6303 Ivy Lane  
Suite 130  
GREENBELT, MD 20770

Purchase Order: COM816

Page: 2 of 1  
Date Printed: 08/16/2010

Order To: PAETEC  
6801 MORRISON BLVD  
CHARLOTTE, NC 28211

PAE001

ORDER DATE	BUYER	TERMS	FOB	SALES ORDER	SHIP VIA	DELIVER TO		
08/16/10	GRIFFIN, RONALD	NET 30				RCager c/o Jeff Baron		
LINE	ITEM/DESCRIPTION	REV	U/M	DUE DATE	DESIRED DATE	QUANTITY	NET UNIT COST	EXTENDED COST

ORDER DATE	BUYER	TERMS	FOB	SALES ORDER	SHIP VIA	DELIVER TO		
09/03/10	GRIFFIN, RONALD	NET 30				Net Ops Al Iannaconne		
LINE	ITEM/DESCRIPTION	REV	U/M	DUE DATE	DESIRED DATE	QUANTITY	NET UNIT COST	EXTENDED COST
	Period of Performance: 09/03/10 To 09/03/12  PAETEC Quote #: 387988 Primary Billing Account #: Billing POC: Jeff Baron 301-837-9007 Technical POC: Al Iannaconne 301-837-3814 POP: 2 Year Term							
***** All invoices must match the sequence, description and quantity identified in this PO. Nonconforming invoices will be returned for correction which will result in payment delays. *****								
1	SVC Greenbelt PRI (3)& LD service PAETEC Quote #: 387988		LS	09/03/10	09/03/10			
				Req: 11871				
	AOP: 8045-005 1.001.05.1.020			001I0005.020.001				
	Bill To: ASRC Federal Holding Company Attention: Accounts Payable PO Box 400 Greenbelt, MD 20768-0400						PO Total Amt:	
Ronald Griffin <small>Digitally signed by Ronald Griffin DN: cn=Ronald Griffin, o=US, ou=ASRC Federal Holding, ou=Procurement, email=Ronald.Griffin@asrcfederal.com Date: 2010.08.18 15:52:45 -04'00'</small>								

ASRC Federal Holding Company  
6303 Ivy Lane  
Suite 130  
Greenbelt, MD 20770

Purchase Order: FH2343

Page: 2 of 1  
Date Printed: 08/16/2010

Order To: PAETEC  
6801 MORRISON BLVD  
CHARLOTTE, NC 28211

PAE001

ORDER DATE	BUYER	TERMS	FOB	SALES ORDER	SHIP VIA	DELIVER TO		
09/03/10	GRIFFIN, RONALD	NET 30				Net Ops Al Iannaconne		
LINE	ITEM/DESCRIPTION	REV	U/M	DUE DATE	DESIRED DATE	QUANTITY	NET UNIT COST	EXTENDED COST
	Authorized Signature(s)							





Quote # 387981  
SERVICE AGREEMENT

600 Willow Brook Office Park  
Fairport, NY 14450

This sets forth the terms of the Service Agreement ("Agreement") made this 13th day of August, 2010, by and between PAETEC as defined in the PAETEC Standard Terms and Conditions of Service ("PAETEC"), and the ASRC Communications, a New Mexico Corporation ("Customer"). The term of this Agreement is for 12 months ("Term"). Customer agrees to a Minimum Monthly Fee of \$1,000. All services provided are subject to the terms and conditions below and on the attached Rate schedule(s).

CUSTOMER INFORMATION

Customer Name: ASRC Communications  
Service Address: 8500 Menaul Blvd NE STE B470, ALBUQUERQUE, NM 87112-2284  
Billing Address: PO BOX 400, GREENBELT, MD 20768-0400  
Contact Name: Jeff Baron Contact Phone: 301-837-9007 Contact Fax: 301-837-9449

SERVICES BEING PROVIDED BY PAETEC TO CUSTOMER

Access Loop Trunks

By signing this Agreement, the Customer hereby authorizes PAETEC to provide the Services listed herein and on any/all attachments. Each month Customer shall purchase at least the Minimum Monthly Fee amount set forth above, calculated prior to application of any taxes or surcharges.

This Agreement is subject to and controlled by PAETEC's federal and state tariffs as applicable, and/or by PAETEC's Standard Terms and Conditions of Service and the service specific terms and conditions as located at <http://www.paetec.com/about-us/notice>, as such tariffs and terms may be modified from time to time and all of which are hereby expressly incorporated by reference.

Information regarding Customer's rights and options pertaining to Customer Proprietary Network Information ("CPNI") is available at <http://www.paetec.com/notice/cpni.html>.

The individual signing the Agreement on behalf of Customer is duly authorized to do so.

Accepted By Customer	Authorized by PAETEC
Signature: <u>[Signature]</u>	Signature: _____
Printed Name: <u>Mark U Austin</u>	Printed Name: _____
Title: <u>Director, Procurement</u>	Title: _____
Date: <u>8/16/10</u>	Date: _____

This offer is voidable by PAETEC if not signed and returned to PAETEC by the 11th day of November, 2010.



## SERVICE LOCATION SUMMARY

### Service Location Listing - Monthly Recurring Charges

Primary Billing Account ASRC Communications, #

Quote # 387981

Sales ID 277162

Location Name & Service Address	Access	Value	Total
ASRC Communications 8500 Menaul Blvd NE STE B470, ALBUQUERQUE, NM 87112-2284			
Total			

The information set forth on this Service Location Listing sets forth the total Monthly Recurring Charge(s) ("MRC") for each Service Location covered under the Agreement. For the breakdown of MRC charges for each Service Location, along with site specific Usage Fees and Non-Recurring Fee(s) ("NRC"), please refer to the site specific Rate Schedule for each Service Location. By signing below, Customer acknowledges that it has received and reviewed the site specific Rate Schedule(s) to the Agreement, and agrees to the information set forth therein.

The individual signing the Agreement on behalf of Customer is duly authorized to do so.

<u>Accepted By Customer</u>	<u>Authorized by PAETEC</u>
Signature: <u>Mark Austin</u>	Signature: _____
Printed Name: <u>Mark Austin</u>	Printed Name: _____
Title: <u>Director, Procurement</u>	Title: _____
Date: <u>8/16/10</u>	Date: _____



Quote # 387988  
SERVICE AGREEMENT

600 Willowbrook Office Park  
Fairport, NY 14450

This sets forth the terms of the Service Agreement ("Agreement") made this 13th day of August, 2010, by and between PAETEC as defined in the PAETEC Standard Terms and Conditions of Service ("PAETEC"), and the ASRC Federal Holdings, a Maryland Corporation ("Customer"). The term of this Agreement is for 24 months ("Term"). Customer agrees to a Minimum Monthly Fee of \$ . All services provided are subject to the terms and conditions below and on the attached Rate Schedule(s).

**CUSTOMER INFORMATION**

Customer Name: ASRC Federal Holdings  
Service Address: 6303 Ivy Ln STE 400, GREENBELT, MD 20770-6331  
Billing Address: PO BOX 400, GREENBELT, MD 20768-0400  
Contact Name: Jeff Baron Contact Phone: 301-837-9007 Contact Fax: 301-837-9449

**SERVICES BEING PROVIDED BY PAETEC TO CUSTOMER**

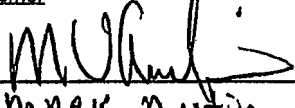
Access Loop Trunks  
Toll-Free (8xx)

By signing this Agreement, the Customer hereby authorizes PAETEC to provide the Services listed herein and on any/all attachments. Each month Customer shall purchase at least the Minimum Monthly Fee amount set forth above, calculated prior to application of any taxes or surcharges.

This Agreement is subject to and controlled by PAETEC's federal and state tariffs as applicable, and/or by PAETEC's Standard Terms and Conditions of Service and the service specific terms and conditions as located at <http://www.paetec.com/about-us/notice>, as such tariffs and terms may be modified from time to time and all of which are hereby expressly incorporated by reference.

Information regarding Customer's rights and options pertaining to Customer Proprietary Network Information ("CPNI") is available at <http://www.paetec.com/notice/cpni.html>.

The individual signing the Agreement on behalf of Customer is duly authorized to do so.

Accepted By Customer	Authorized by PAETEC
Signature: 	Signature: _____
Printed Name: <u>MARK Austin</u>	Printed Name: _____
Title: <u>Director, Procurement</u>	Title: _____
Date: <u>8/16/10</u>	Date: _____

This offer is voidable by PAETEC if not signed and returned to PAETEC by the 11th day of November, 2010.



## SERVICE LOCATION SUMMARY

### Service Location Listing - Monthly Recurring Charges

Primary Billing Account ASRC Federal Holdings, #

Quote # 387988

Sales ID 277162

Location Name & Service Address	Address	Value	Total
ASRC Federal Holdings 6303 Ivy Ln STE 400, GREENBELT, MD 20770-6331			
Total			

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The individual signing the Agreement on behalf of Customer is duly authorized to do so.

<u>Accepted By Customer</u>	<u>Authorized by PAETEC</u>
Signature: <u>[Signature]</u>	Signature: _____
Printed Name: <u>Mark W Austin</u>	Printed Name: _____
Title: <u>Director Procurement</u>	Title: _____
Date: <u>8/18/10</u>	Date: _____



Quote # 387989  
SERVICE AGREEMENT

600 Willow Brook Office Park  
Fairport, NY 14450

This sets forth the terms of the Service Agreement ("Agreement") made this 13th day of August, 2010, by and between PAETEC as defined in the PAETEC Standard Terms and Conditions of Service ("PAETEC"), and the ASRC Management Services, a Virginia Corporation ("Customer"). The term of this Agreement is for 12 months ("Term"). Customer agrees to a Minimum Monthly Fee of \$ All services provided are subject to the terms and conditions below and on the attached Rate Schedule(s).

CUSTOMER INFORMATION

Customer Name: ASRC Management Services  
Service Address: 12021 Sunset Hills Rd STE 330, RESTON, VA 20190-5863  
Billing Address: PO BOX 400, GREENBELT, MD 20768-0400  
Contact Name: Jeff Baron Contact Phone: 301-837-9007 Contact Fax: 301-837-9449

SERVICES BEING PROVIDED BY PAETEC TO CUSTOMER

Access Loop Trunks

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Signature: <u>[Signature]</u>	Signature: _____
Printed Name: <u>Mark Austin</u>	Printed Name: _____
Title: <u>Director Procurement</u>	Title: _____
Date: <u>8/16/10</u>	Date: _____

This offer is voidable by PAETEC if not signed and returned to PAETEC by the 11th day of November, 2010.



## SERVICE LOCATION SUMMARY

### Service Location Listing - Monthly Recurring Charges

Primary Billing Account ASRC Management Services, #

Quote # 387989

Sales ID 277162

Location Name / Service Address	Access	Voice	Total
ASRC Management Services 12021 Sunset Hills Rd STE 330, RESTON, VA 20190-5863			
Total			

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The individual signing the Agreement on behalf of Customer is duly authorized to do so.

<u>Accepted By Customer</u>		<u>Authorized by PAETEC</u>	
Signature: <u>[Signature]</u>		Signature: _____	
Printed Name: <u>Mark W. Austin</u>		Printed Name: _____	
Title: <u>Director, Procurement</u>		Title: _____	
Date: <u>8/16/10</u>		Date: _____	